

**EXHIBIT A**

## UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

\_\_\_\_\_  
*Plaintiff*

v.

\_\_\_\_\_  
*Defendant*)  
)  
)  
)  
)  
)  
)

Civil Action No. \_\_\_\_\_

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To:

\_\_\_\_\_  
*(Name of person to whom this subpoena is directed)*

☐ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place:	Date and Time:
--------	----------------

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT

OR

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*\_\_\_\_\_  
*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* \_\_\_\_\_, who issues or requests this subpoena, are:

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**


(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.


(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.



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**Patrick Gomez** · 2nd

Export Manager at Wayne Farms

Wisconsin, United States · 500+ connections · [Contact info](#)

 Wayne Farms

 Wisconsin School of Bu




**PREMIUM**

**Directly message Patrick with InMail**


Use your Premium InMail credits to directly message members you're not connected to and reach hiring managers, business leaders, and others who can help you get ahead.

### Highlights



**25 mutual connections**

You and Patrick both know: CLAY COUGHLIN, Lisa Weaver, and 23 others



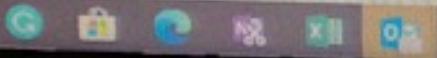
**You both work at Wayne Farms**


Patrick started at Wayne Farms 5 years and 7 months after you did

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**Patrick Gomez** · 2nd  
 Export Manager at Wayne Farms  
 Wisconsin, United States · 500+ connections · [Contact info](#)

 **Wayne Farms**  
 **Wisconsin School of Business**

### Highlights


**14 mutual connections**  
 You and Patrick both know Miranda Frye, Marilyn Raybin, and 12 others



**You both work at Wayne Farms**  
 Patrick started at Wayne Farms 24 years after you did  
[Say hello](#)


[Show more](#)


### About

We are leading role model in food production and we export nationwide, our major products includes Frozen Foods such as Chicken Paw, Chicken Feet, Chicken MJW etc.....


#### Promoted



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 Advisory Boards are Seeking CEOs Right Now - Search 42 Currently Open.



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 Accepting Scholarship Candidates for Jack Welch MBA. Classes start Oct 6th



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#### People Also Viewed


**Francis Herring** · 2nd  
 Sales Representative


**Tov Schwartz** · 2nd  
 Sales manager at Kleins Naturals Ltd


**Berry Beatrice** · 3rd  
 Grocery Manager at Grocery Outlet


**Pietro Pittaluga** · 2nd  
 --


**Amy Spuck** · 2nd  
 Sr. Director of Sales at Bimbo QSR



**Patrick Gomez**

Mobile • 2h ago



**Patrick Gomez** • 1st

Export Manager at Wayne Farms

TODAY



**Patrick Gomez** • 1:04 AM

We are leading expert supplier of all Chicken Frozen Foods and Egg

All shipments of our products to the ports of delivery are quality inspected with a complete custom approval policy for all goods on board insured and covered with an insurance policy.

Contact us today ;

Email :

[patrickwaynefarms@outlook.com](mailto:patrickwaynefarms@outlook.com)

[patrickwaynefarms@consultant.com](mailto:patrickwaynefarms@consultant.com)

Call or text : +1 323 486 5804

WhatsApp : +1 (204) 813-6903



Thanks

Okay

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530 Lytton Avenue, 2nd Floor  
Palo Alto, CA 94301  
Telephone: 650/617-3226  
Facsimile: 650/644-0200

Attorneys for LINKEDIN CORPORATION

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF ILLINOIS

WAYNE FARMS, LLC,

Plaintiff,

v.

JANE DOE AND LINKEDIN CORPORATION,

Defendants.

Case No. 20-5191

LINKEDIN CORPORATION'S RESPONSE  
AND OBJECTIONS TO SUBPOENA  
ISSUED BY PLAINTIFF WAYNE FARMS  
LLC

SKAGGS|FAUCETTE LLP



PROPOUNDING PARTY: WAYNE FARMS LLC

RESPONDING PARTY: LINKEDIN CORPORATION

LinkedIn Corporation (“LinkedIn”), hereby objects and responds to the subpoena (“Subpoena”) served by the attorney for Plaintiff Wayne Farms LLC (“Plaintiff”) responses and objections are based on its current understanding of the lawsuit and the Subpoena. LinkedIn reserves the right to modify or supplement its responses and objections. LinkedIn also reserves the right to make any motion with respect to the Subpoena.

### GENERAL OBJECTIONS

1. LinkedIn objects to the Subpoena to the extent that it seeks the production of information from sources that are not reasonably accessible because of undue burden or cost or otherwise.

2. LinkedIn objects to the Subpoena to the extent it seeks information that is available from the parties to the litigation or other sources.

3. LinkedIn objects to the Subpoena to the extent it is intended to impose any obligations on any persons or entities other than LinkedIn, the sole entity named in the Subpoena, including but not limited to subsidiaries or affiliates of LinkedIn.

4. LinkedIn objects to the Subpoena to the extent it requests the production of information beyond the possession, custody or control of LinkedIn.

5. LinkedIn objects to the Subpoena to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or protection from discovery under the California Code of Civil Procedure, the California Evidence Code, the California Family Code, and/or any other applicable statutes, regulations, and common law protections. LinkedIn intends to claim and hereby claims all applicable privileges and protections from discovery, and, in the event that LinkedIn provides responsive documents, any mistaken or inadvertent production of privileged or protected documents is not intended to, and shall not, waive any of these privileges or protections. LinkedIn is not presently in a position to provide a description of the nature of the information that is subject to a claim of privilege or protection. In the event the

Subpoena is found valid and enforceable, in whole or in part, LinkedIn will provide such a description within a reasonable period of time.

6. LinkedIn objects to the Subpoena to the extent it seeks trade secrets or other confidential research, development, or commercial information, or other proprietary information protected from disclosure.

7. LinkedIn objects to the Subpoena to the extent that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence.

8. LinkedIn objects to the Subpoena as overbroad and unduly burdensome.

9. LinkedIn objects to Subpoena to the extent it seeks to impose obligations beyond or inconsistent with those imposed by the applicable California statutes.

#### RESPONSES TO REQUEST FOR DOCUMENTS

##### REQUEST FOR PRODUCTION NO. 1:

All documents and information relating JOHN DOE with a fake LinkedIn profile as an employee of Wayne Farms LLC or Wayne Farms LLC USA, Phone text, WhatsApp or mobile number: +1(204) 813-6903 or +1 (323) 486-5804; Email [patrickwaynefarms@consultant.com](mailto:patrickwaynefarms@consultant.com) or [patrickwaynefarms@outlook.com](mailto:patrickwaynefarms@outlook.com) (see attached)

##### RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

In addition to its general objections, each of which is specifically incorporated herein by reference, LinkedIn objects to this request as vague and ambiguous with respect to the scope of the information sought and the manner or production, and in particular the terms “all documents and information” which may seek information protected by privacy rights and other protections. LinkedIn also objects to the Request to the extent it requests the production of documents beyond the possession, custody or control of LinkedIn. For example, LinkedIn does not have members’ social security numbers, telephone connection records, or MAC addresses. LinkedIn also objects to the Request to the extent that it seeks the content of communications and investigations. Production of records beyond basic subscriber information as defined at 18 U.S.C. § 2703(c)(2) without the consent of the LinkedIn member would exceed the disclosure permitted under the Stored Communications Act, 18

1 U.S.C. §§ 2702-03 ("SCA"). Under the SCA, LinkedIn is prohibited from disclosing the connections  
2 or content of user communications or stored files, unless a specific statutory exception permits the  
3 disclosure. 18 U.S.C. §§ 2702-2703. There is no general statutory exception that would allow  
4 LinkedIn to produce contents in response to your Request. LinkedIn reserves the right to add  
5 objections if necessary following any meet and confer.

6 Subject to, and without waiving these objections, LinkedIn will provide the following  
7 information associated with the profile associated with each of the two email addresses identified as  
8 well as the Patrick Gomez profile identified (Wisconsin, United States):

- 9 • Email Addresses
- 10 • Profile Snapshot
- 11 • Profile Information
- Registration

12 LinkedIn considers this information to be fully responsive to the Request and to have satisfied  
13 LinkedIn's entire obligation in responding to the Subpoena.

14  
15 DATED: October \_\_, 2020.

SKAGGS FAUCETTE LLP

16  
17 By: \_\_\_\_\_  
JASON M. SKAGGS

18 Attorneys for LINKEDIN CORPORATION.  
19  
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24  
25  
26  
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28



**Patrick Gomez** ·

Export Manager at Wayne Farms

Wisconsin, United States · 500+ connections ·



Wayne Farms



Wisconsin School of Business

## About

We are leading role model in food production and we export nationwide, our major products includes Frozen Foods such as Chicken Paw, Chicken Feet, Chicken MJW etc.....

patrickwaynefarms@consultant.com

## Activity

1,913 followers

Posts Patrick created, shared, or commented on in the last 90 days are displayed here.

[See all activity](#)

## Experience



### Export Manager

Wayne Farms · Full-time

May 2020 – Present · 6 mos

Georgia, United States



### Executive Distributor

Butchers Pride Steak & Seafood Company

Feb 2013 – May 2020 · 7 yrs 4 mos

Wisconsin, United States

Categorized under Frozen Fish, Meat, and Poultry.

LINKEDIN-WF-000001



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**Wholesale Sales Manager**

Frozen Specialties, Inc.

Mar 2008 – Oct 2012 · 4 yrs 8 mos

Gomez\_Registration.csv

Registered At	Registration Ip	Subscription Types
6/16/20, 12:51 AM	45.82.254.20	



Gomez\_Logins.csv

Login Date	IP Address	User Agent	Login Type
Tue Jun 23 02:28:34 UTC 2020	66.115.157.13	LIAuthLibrary:36.0.* com.linkedin.LinkedIn:9.15.5204.4 iPhone:12.4.5	Login
Wed Jul 22 08:29:51 UTC 2020	156.146.46.65	LIAuthLibrary:36.0.* com.linkedin.LinkedIn:9.15.5204.4 iPhone:12.4.5	Login

Gomez\_Email Addresses.csv

Email Address	Confirmed	Primary	Updated On
godsonnguyen101@gmail.com	Yes	Yes	6/16/20, 12:51 AM
butcherspride.frozenfoods@gmail.com	No	No	6/22/20, 7:27 PM

Gomez\_Profile csv

First Name	Last Name	Maiden Name	Address	Birth Date	Headline	Summary	Industry	Zip Code	Geo Location	Twitter Handles	Websites	Instant Messengers
Patrick	Gomez				Export Manager at Wayne Farms	We are leading role model in food production and we export nationwide, our major products includes Frozen Foods such as Chicken Paw,Chicken Feet,Chicken MJW etc..... patrickwaynefarms@con sultant com	Food Production		Wisconsin, United States			



# Bright Lincon

Salesperson at Wayne Farms

Covington, Georgia, United States ·



Best Buy



University of Oxford

## Activity

Posts Bright created, shared, or commented on in the last 90 days are displayed here.

[See all activity](#)

## Experience



### Salesperson

Best Buy

Feb 2018 – Present · 2 yrs 9 mos

Mississippi, United States

## Education



### University of Oxford

Master of Business Administration - MBA, Marketing/Marketing Management, General, A

1983 – 1990

Activities and Societies: Poultry

## Skills & Endorsements

### Management

Education

Marketing

Sales Management

Industry Knowledge

Account Management

Interests



**University of Oxford**  
572,254 followers



**Forbes**  
14,964,413 followers



**LinkedIn**  
13,198,775 followers



**Wayne Farms**  
11,504 followers



**Bill Gates**   
Co-chair, Bill & Melinda Gates Foundation  
29,611,174 followers



**Best Buy**  
384,739 followers

Lincon\_Registration.csv

Registered At	Registration Ip	Subscription Types
8/31/20, 6:28 AM	197.242.101.205	



Lincon\_Logins.csv

Login Date	IP Address	User Agent	Login Type
Mon Aug 31 16:05:13 UTC 2020	209.95.50.60	Mozilla/5.0 (iPhone; CPU iPhone OS 12_4_5 like Mac OS X) AppleWebKit/605.1.15 (KHTML, like Gecko) Version/12.1.2 Mobile/15E148 Safari/604.1	Login

Lincon\_Email Addresses.csv

Email Address	Confirmed	Primary	Updated On
patrickwaynefarms@outlook.com	Yes	Yes	8/31/20, 6:30 AM

Lincon\_Profile.csv

First Name	Last Name	Maiden Name	Address	Birth Date	Headline	Summary	Industry	Zip Code	Geo Location	Twitter Handles	Websites	Instant Messengers
Bright	Lincon				Salesperson at Wayne Farms		Food Production	30018	Covington, Georgia, United States			



## Tristan Slessor

Sales Manager at Best Buy Inc

Salt Lake City, Utah, United States · 2 connections ·



T-Mobile

### Activity

2 followers

Posts Tristan created, shared, or commented on in the last 90 days are displayed here.

[See all activity](#)

### Experience



#### Independent Distributor

T-Mobile



#### Sales Manager

Best Buy Inc · Full-time

Mar 2013 – Present · 7 yrs 8 mos

United States

Diligent and trusted Distributor of the year

### Interests



#### LinkedIn News

3,972,243 followers



#### T-Mobile

405,896 followers

Slessor\_Registration.csv

Registered At	Registration Ip	Subscription Types
9/2/20, 5:05 AM	209.95.56.53	

Slessor\_Logins.csv

Login Date	IP Address	User Agent	Login Type
		Mozilla/5.0 (iPhone; CPU iPhone OS 12_4_5 like Mac OS X) AppleWebKit/605.1.15 (KHTML, like Gecko) Version/12.1.2	
Wed Sep 02 13:44:54 UTC 2020	212.102.59.129	Mobile/15E148 Safari/604.1	Login



Slessor\_Email Addresses.csv

Email Address	Confirmed	Primary	Updated On
patrickwaynefarms@consultant.com	Yes	Yes	9/2/20, 5:07 AM

Slessor\_Profile.csv

First Name	Last Name	Maiden Name	Address	Birth Date	Headline	Summary	Industry	Zip Code	Geo Location	Twitter Handles	Websites	Instant Messengers
Tristan	Slessor				Sales Manager at Best Buy Inc		Telecommunications	84101	Salt Lake City, Utah, United States			